

JUN 7 - 1993

Mr. Gerry Korb
Vice President, Manufacturing
The Knapheide Mfg. Company
P.O. Box C-140
436 South 6th Street
Quincy, Illinois 62306-2140

I'm
CONFUSED.
How DID WE
DO THIS? WHY
ARE WE SAYING
THIS?

Dear Mr. Korb:

I have reviewed the Schreiber, Grana & Yonley revision of the Closure Plan for the Waste Paint Filters and Overspray Paper Storage Unit and the Brule Incinerator (closure plan) submitted by you for the Knapheide Mfg. Company (Knapheide). The May 10 closure plan generally addresses EPA's comments on the original closure plan.

The original closure plan states (on page 17) that the incinerator will be recycled as scrap metal, if possible, and did not address decontamination or disposal of the concrete pad. The revised closure plan states (on page 11) that the incinerator and its associated concrete pad will be disposed of at an approved hazardous waste disposal facility. EPA accepts this change.

A minor difference between the original closure plan and the May 10 closure plan is the size of the closure area. Figure No. 6 in the original closure plan shows the closure area to extend approximately 65 feet to the northeast of the Brule incinerator unit and 10 feet to the southwest of the storage unit. Figure No. 3 in the May 10 closure plan shows the "material transport pathway area" (closure area) to extend only to the northeast corner of the Brule incinerator unit and the southwest edge of the storage area. Because Knapheide has written that the exact dimensions of the closure area are not evident based on current site conditions, EPA does not accept the area as defined in the revision and required Knapheide to close the facility as defined in the original closure plan.

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RCOM
MCCULLERS

CNSL
RICHARDS

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DOYLE

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RCRA Records Center

A deficiency noted in the May 10 closure plan is that it does not establish specific closure performance standards. As you know EPA is reviewing this plan to determine if it complies with the terms of the Consent Agreement and that the Missouri Department of Natural Resources is responsible for approving closure performance standards and granting closure. Therefore, this deficiency is not required to be corrected as part of the Consent Agreement.

EPA approves this plan if the modification required in the third paragraph is made and acknowledge by letter within ten (10) days of receipt of this letter. If you have any questions, contact me at (913) 551-7455.

Sincerely,

Ruben B. McCullers
Environmental Scientist
RCRA Compliance Section

cc: ~~Gerry Korb, The Knapheide Mfg. Co.~~
Steve Jakes, MDNR ✓

bcc: Eric Hess, PRC ✓
Bob Richards, CNSL ✓